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Matthew L. Tuccillo

Partner

September 28, 2016

VIA ECF – MAIN MDL DOCKET

Honorable Keith P. Ellison
United States District Judge
Southern District of Texas
Bob Casey Federal Courthouse
515 Rusk Avenue, Third Floor, Room 3716
Houston, TX 77002

Re: *In re BP p.l.c. Sec. Litig.*, MDL 2185 Individual Actions

Dear Judge Ellison:

My firm is on the Individual Action Plaintiffs' Steering Committee (the "Steering Committee") in MDL 2815 and serves as the sole Court-appointed Liaison with Defendants and the Court, pursuant to ¶13 of the Court's Order on Pretrial Coordination and Leadership of MDL 2185 Individual Actions, dated December 11, 2013 (Dkt. No. 721) (the "Leadership Order"). In those capacities, pursuant to Leadership Order ¶¶14-15 and pursuant to the Court's Scheduling/Docket Control Order (Dkt. No. 1630) (the "Case Management Order" or "CMO"), I respectfully submit this letter, on behalf of the Steering Committee, with approval from Defendants' counsel, to provide the Court with an update.

Pursuant to CMO ¶2, the following eight representative Plaintiffs were chosen:

1. Mondrian International Equity Fund, L.P.
2. South Yorkshire Pensions Authority
3. Lincolnshire County Council
4. Public School & Education Employee Retirement Systems of Missouri
5. KBC Asset Management NV
6. Public Employees Retirement Association of Colorado
7. Metzler Investment GmbH
8. Teachers Retirement System of Texas

Pursuant to CMO ¶3, the following eight representative Plaintiffs were chosen:

9. Universities Superannuation Scheme Ltd.
10. North Carolina Department of State Treasurer
11. GIC Private Limited
12. Washington State Investment Board
13. Louisiana State Employees' Retirement System

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14. New York State Common Retirement Fund
15. International Fund Management S.A.
16. Avalon Holdings, Inc.

CMO ¶4 states that a proposed Deposition Protocol Order (“DPO”) shall be submitted within 45 days of the selection of the representative Plaintiffs under CMO ¶3, or by October 1, 2018. The Steering Committee and Defendants believe that more time will be necessary. We propose to either submit the draft DPO or provide the Court with another update by October 15, 2018. We would appreciate the Court’s guidance as to whether this proposal is acceptable and thank the Court for its attention.

Respectfully,



Matthew L. Tuccillo

cc: Marc De Leeuw (Sullivan & Cromwell LLP) via ECF
All Counsel via ECF